

4

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Marion County
D. Craig Brown, Circuit Court Judge

RECEIVED
MAY 04 2015
SC Court of Appeals

THE STATE,

RESPONDENT,

V.

SHAHEED HAYES,

APPELLANT

APPELLATE CASE NO. 2014-001837

**PETITION FOR EXTENSION TO FILE
INITIAL BRIEF OF APPELLANT AND
DESIGNATION OF MATTER**

The undersigned counsel would respectfully request a thirty-day extension in which to file the initial brief of appellant and designation of matter in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following exigent circumstances:

1. The initial brief of appellant and designation of matter in this case are due to be served and filed today having been extended by two prior orders of this Court.
2. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Gary Clifton Hamilton in this Court on April 30, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Carlos Luis

Pinales Mejia v. State in the Supreme Court on April 27, 2015. Counsel filed the petition for writ of certiorari to this Court in the case of State v. Darryl L. Drayton with the Supreme Court on April 20, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Kenneth Campbell in this Court on April 16, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of James Enrico Diago v. State in the Supreme Court on April 14, 2015. Counsel filed the Anders Brief of Appellant and Designation of matter along with the Record on Appeal in the case of State v. Michael Edward Hockaday in this Court on April 9, 2015. Counsel filed the Anders Brief of Appellant and Designation of matter along with the Record on Appeal in the case of State v. Robert Lee Wright in this Court on April 7, 2015. Counsel filed the Anders Brief of Appellant and Designation of matter along with the Record on Appeal in the case of State v. Brandon L. Goins in this Court on April 2, 2015. Counsel filed the petition for rehearing in the case of State v. Kenneth Andrew Lynch in this Court on April 2, 2015. Counsel filed the petition for rehearing in the case of State v. Marvin Bowens Green in this Court on March 26, 2015. Counsel filed a petition for writ of certiorari in the case of Richard Bernard Moore v. State of South Carolina in the United States Supreme Court on March 23, 2015, as a co-counsel with Robert M. Dudek. Counsel filed the petition for rehearing in the case of Stephen Corey Bryant v. State in the Supreme Court on March 19, 2015. Counsel filed a petition for writ of certiorari in the case of James Prather v. State in the United States Supreme Court on March 18, 2015. Counsel filed the Brief of Petitioner in the case of State v. David Gerrard Johnson in the Supreme Court on March 12, 2015. Counsel filed a petition for writ of certiorari in the case of State v. Derringer Young in the United States Supreme

Court on March 10, 2015. Counsel filed the Brief of Petitioner in the case of Drew John Monahan v. State in this Court on March 9, 2015. Counsel argued in the case of State v. Nathaniel B. Beeks in this Court on March 4, 2015.

3. This request is made in good faith, and not for purposes of delay.

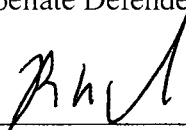
4. As indicated by his consent below, counsel for the state graciously consents to or does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension in which to file the initial brief of appellant and designation of matter in this case. Counsel requests that the time limits for filing the initial brief of appellant and designation of matter be held in abeyance pending a ruling on this motion.

Respectfully submitted,



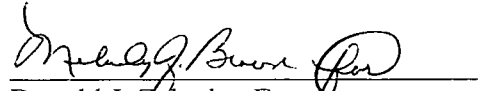
Susan B. Hackett
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

May 4, 2015

I DO NOT OPPOSE:



Donald J. Zelenka, Esquire